

3. The subject matter jurisdiction of this Court is based upon diversity of citizenship pursuant to 28 U.S.C.S. § 1332 (1998).

4. Venue is proper in the Northern District of Ohio as the accident which gives rise to this Complaint took place within this district.

COUNT I

5. Plaintiff realleges and incorporates by reference all of the allegations contained in Paragraphs 1 through 4 as if fully rewritten herein.

6. On or about July 17, 2010, the Plaintiff was a passenger on a motorcycle which was lawfully driving through an intersection on a green light in Akron, Ohio.

7. At that time, a driver on behalf of Defendant Building Materials negligently and unlawfully drove its vehicle through that intersection against the red light, striking the motorcycle, and Plaintiff Robin Foore.

8. Defendant's driver proceeding through the intersection on the red light occurred in front of and was directly witnessed by several independent witnesses.

9. As a direct and proximate result of Defendant's negligence, Plaintiff Robin Foore sustained serious and permanent injuries, including the loss of her left leg; has undergone, and continues to undergo, severe pain and suffering; has incurred substantial medical expenses, which will continue for the rest of her life; has sustained a vocational loss; and has suffered a permanent impairment in her normal, social and recreational pursuits.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount of TWO MILLION SEVEN HUNDRED FIFTY THOUSAND DOLLARS (\$2,750,000.00), together with interest, costs of this action, attorney fees, and any other and further relief this Court deems just and proper.

Respectfully submitted

STANLEY P. ARONSON (0024836)
ARONSON & ASSOCIATES
3085 W. Market Street, Suite 130
Akron, OH 44333
Telephone: (330) 836-5500
Attorney for Plaintiff